

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>CHHUN PRIL,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a "Wolf,"</b>	<b>:</b>	<b>21 U.S.C. § 846(conspiracy to distribute</b>
<b>TONY NGUYEN</b>	<b>:</b>	<b>MDMA - 1 count)</b>
<b>OLUTOKUNBO EFUNNUGA,</b>	<b>:</b>	<b>18 U.S.C. § 922(g)(1) (convicted felon in</b>
<b>a/k/a "Sheng," a/k/a "Shizz,"</b>	<b>:</b>	<b>possession of a firearm - 3 counts)</b>
<b>JENNIFER KHOUNSACKNARATH</b>	<b>:</b>	<b>Notice of forfeiture</b>
<b>DANNY KLOT</b>	<b>:</b>	

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From on or about April 24, 2008, to on or about August 19, 2008, in the Eastern District of Pennsylvania and elsewhere, defendants

**CHHUN PRIL,  
a/k/a "Wolf,"  
TONY NGUYEN,  
OLUTOKUNBO EFUNNUGA,  
a/k/a "Sheng," a/k/a "Shizz,"  
JENNIFER KHOUNSACKNARATH, and  
DANNY KLOT**

conspired and agreed together, and with other persons known and unknown to the grand jury, to knowingly and intentionally distribute a mixture and substance containing a detectable amount of 3,4-methylenedioxymethamphetamine, commonly known as "MDMA" and/or "ecstasy," that is, approximately 30,000 MDMA pills, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

## **MANNER AND MEANS**

It was part of the conspiracy that:

2. Defendant CHHUN PRIL, a/k/a “Wolf,” ordered approximately 5,000 MDMA pills at a time, approximately every two to three weeks, from suppliers in Lowell, Massachusetts, who, in turn, obtained the MDMA pills from manufacturers in Canada.

3. Defendant CHHUN PRIL, a/k/a “Wolf,” drove from Upper Darby, Pennsylvania, to Lowell, Massachusetts, to obtain MDMA supplies for MDMA brokers and mid-level distributors in the Philadelphia, Pennsylvania area, including defendant TONY NGUYEN.

4. Defendant DANNY KLOT accompanied defendant CHHUN PRIL, a/k/a “Wolf,” to Lowell, Massachusetts, to assist in transporting the pills and notifying customers, including defendant TONY NGUYEN, of their return to Upper Darby, Pennsylvania, to distribute the pills promptly upon their arrival. Defendant DANNY KLOT also collected narcotics proceeds for defendant CHHUN PRIL, a/k/a “Wolf,” from the sale of MDMA and reported to defendant CHHUN PRIL, a/k/a “Wolf,” on the quality of the MDMA.

5. Defendant TONY NGUYEN, an MDMA broker, obtained MDMA pills from defendant CHHUN PRIL, a/k/a “Wolf,” in amounts ranging typically of 100 to 1,000 pills at a time. Defendant TONY NGUYEN then sold the pills, in amounts typically of 100 to 1,000 at a time, to mid-level distributors, including defendant OLUTOKUNBO EFUNNUGA, a/k/a “Sheng,” a/k/a “Shizz,” and others known and unknown to the grand jury.

6. Defendant OLUTOKUNBO EFUNNUGA, a/k/a “Sheng,” a/k/a “Shizz,” purchased MDMA pills, in amounts of approximately 1,000 at a time, from defendant TONY

NGUYEN and also distributed MDMA pills to defendant TONY NGUYEN, depending on the availability of certain types of MDMA supply.

7. Defendant JENNIFER KHOUNSACKNARATH collected drug money from the MDMA customers of defendant CHHUN PRIL, a/k/a “Wolf,” delivered MDMA pills to drug customers of defendants CHHUN PRIL, a/k/a “Wolf,” and TONY NGUYEN, and relayed messages to and from drug customers of defendant CHHUN PRIL, a/k/a “Wolf,” concerning the availability of various types of MDMA pills, and the monies owed by drug customers.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. On or about May 21, 2008, defendant TONY NGUYEN called defendant CHHUN PRIL, a/k/a “Wolf,” and ordered approximately 1,000 MDMA pills for defendant OLUTOKUNBO EFUNNUGA, a/k/a “Sheng,” a/k/a “Shizz.”

2. On or about May 21, 2008, defendant TONY NGUYEN and defendant JENNIFER KHOUNSACKNARATH delivered 1,000 MDMA pills to defendant OLUTOKUNBO EFUNNUGA, a/k/a “Sheng,” a/k/a “Shizz,” at the 69<sup>th</sup> Street Terminal, Upper Darby, Pennsylvania.

3. On or about June 19, 2008, defendant OLUTOKUNBO EFUNNUGA, a/k/a “Sheng,” a/k/a “Shizz,” ordered 1,000 MDMA pills from defendant TONY NGUYEN, for \$2,500 paid immediately with the balance to be paid later.

4. On or about June 19, 2008, defendant TONY NGUYEN received 1,000 MDMA pills from defendant CHHUN PRIL, a/k/a “Wolf,” in the vicinity of 54 Garret Road,

Upper Darby, Pennsylvania, and delivered the said 1,000 MDMA pills to defendant OLUTOKUNBO EFUNNUGA, a/k/a “Sheng,” a/k/a “Shizz,” in the vicinity of 69<sup>th</sup> and Market Streets, Upper Darby, Pennsylvania.

5. On or about June 20, 2008, defendant OLUTOKUNBO EFUNNUGA, a/k/a “Sheng,” a/k/a “Shizz,” called defendant TONY NGUYEN to pay \$1,500 toward the amount owed for 1,000 MDMA pills obtained on or about June 19, 2008.

6. On or about June 26, 2008, defendant CHHUN PRIL, a/k/a “Wolf,” ordered 5,000 “tiger head” MDMA pills from an MDMA supplier in Lowell, Massachusetts, a co-conspirator known to the grand jury, for \$3.25 per pill.

7. On or about June 30, 2008, defendants CHHUN PRIL, a/k/a “Wolf,” and DANNY KLOT drove from Upper Darby, Pennsylvania, to Lowell, Massachusetts, to obtain approximately 5,000 MDMA pills from a co-conspirator known to the grand jury.

8. On or about June 30, 2008, defendant OLUTOKUNBO EFUNNUGA, a/k/a “Sheng,” a/k/a “Shizz,” spoke with TONY NGUYEN about the time of the arrival of the MDMA supply expected on that date from defendant CHHUN PRIL, a/k/a “Wolf.”

9. On or about June 30, 2008, defendant DANNY KLOT instructed defendant TONY NGUYEN to arrive alone, at 11:00 p.m., at the residence of defendant CHHUN PRIL, a/k/a “Wolf,” that is, at 7249 Brent Road, Upper Darby, Pennsylvania.

10. On or about June 30, 2008, defendant TONY NGUYEN told defendant OLUTOKUNBO EFUNNUGA, a/k/a “Sheng,” a/k/a “Shizz,” that the MDMA pills would arrive at approximately 11:30 p.m.

11. On or about June 30, 2008, defendant TONY NGUYEN spoke with defendant JENNIFER KHOUNSACKNARATH to confirm that defendant CHHUN PRIL, a/k/a

“Wolf,” was home and whether the MDMA pills were “transformers,” (i.e., a code name for a type of MDMA pills).

12. On or about June 30, 2008, defendant TONY NGUYEN picked up 1,000 blue “transformers” at 7249 Brent Road, Upper Darby, Pennsylvania, and, at the direction of defendant OLUTOKUNBO EFUNNUGA, a/k/a “Sheng,” a/k/a “Shizz,” he delivered the said 1,000 MDMA pills to 728 North 63<sup>rd</sup> Street, Upper Darby, Pennsylvania, the residence of defendant OLUTOKUNBO EFUNNUGA, a/k/a “Sheng,” a/k/a “Shizz.”

13. On or about August 19, 2008, defendant CHHUN PRIL, a/k/a “Wolf,” drove to Lowell, Massachusetts, from Upper Darby, Pennsylvania, and obtained approximately 5,200 MDMA pills from an MDMA supplier and co-conspirator known to the grand jury.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

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**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 20, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**OLUTOKUNBO EFUNNUGA,  
a/k/a “Sheng,” a/k/a “Shizz,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is: (1) one 9 mm Walther PPK/S handgun, serial no. 5032416, loaded with eight rounds of ammunition; and (2) one .30 caliber Iver Johnson Arms Model M-1 semi-automatic rifle, serial no. AA07929, with magazine containing 15 rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 20, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**CHHUN PRIL  
a/k/a “Wolf,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is: (1) one .380 caliber Davis Industries Model P-380 handgun, serial number AP485285, with magazine containing five rounds of ammunition; and (2) one .22 caliber Magnum Frontier Scout Colt revolver, with an obliterated serial number, loaded with six rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 3, 2008, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**DANNY KLOT,**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable  
by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate  
and foreign commerce a firearm, that is, one .380 caliber Davis Industries Model P-380 handgun,  
serial number AP485285.

In violation of Title 18, United States Code, Section 922(g)(1).



**NOTICE OF FORFEITURE**  
**(Drug Trafficking Conspiracy - 21 U.S.C. § 846)**

1. As a result of the violation of Title 21, United States Code, Section 846, set forth in Count One of this indictment, defendants

**CHHUN PRIL,  
a/k/a “Wolf,”  
TONY NGUYEN,  
OLUTOKUNBO EFUNNUGA,  
a/k/a “Sheng,” a/k/a “Shizz”  
JENNIFER KHOUNSACKNARATH, and  
DANNY KLOT**

shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, the entirety of their interest in:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

**NOTICE OF FORFEITURE**  
**(Possession of Firearm By a Convicted Felon - 18 U.S.C. § 922(g)(1))**

As a result of the violations of Title 18, United States Code, Section 922(g)(1), set forth in this indictment, defendants

**CHHUN PRIL,**  
**a/k/a “Wolf,”**  
**OLUTOKUNBO EFUNNUGA,**  
**a/k/a “Sheng,” a/k/a “Shizz,” and**  
**DANNY KLOT**

shall forfeit to the United States of America all firearms and ammunition involved in the commission of such offenses, as set forth in Counts Two through Four of this indictment, namely:

(1) a 9 mm Walther PPKS handgun, serial no. 5032416, loaded with eight rounds of ammunition;

(2) a .30 caliber Iver Johnson AR Model M-1 semi-automatic rifle, serial no. AA07929, with magazine containing 15 rounds of ammunition;

(3) a .380 caliber Davis Industries silver handgun, serial number AP485285, with magazine containing five rounds of ammunition; and

(4) a .22 caliber Frontier Scout silver Colt revolver, serial number obliterated, loaded with six rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and 18 United States Code, Section 924(d).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**LAURIE MAGID**  
**ACTING UNITED STATES ATTORNEY**